IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	§	
In re:	§	Chapter 11
	§	-
INSTANT BRANDS ACQUISITION	§	Case No. 23-90716 (DRJ)
HOLDINGS INC., et al.,	§	
	§	
Debtors. ¹	§	(Joint Administration Requested)
	§	· · · · · · · · · · · · · · · · · · ·

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

On June 12, 2023, Instant Brands Acquisition Holdings Inc. and its affiliated debtors and debtors-in-possession (collectively, the "**Debtors**") commenced voluntary petitions for relief under title 11 of the United States Code (the "**Bankruptcy Code**") in the United States Bankruptcy Court for the Southern District of Texas (the "**Court**"). The undersigned proposed counsel believes that these chapter 11 cases qualify as complex chapter 11 cases because:

X	The debtors have total debt of more than \$10 million;	
X	There are more than 50 parties in interest in this case;	
	Claims against the debtors are publicly traded;	
	Other (Substantial explanation is required. Attach additional sheets if necessary.)	

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or registration numbers in the applicable jurisdictions, are as follows: Instant Brands (Texas) Inc. (2526); Instant Brands Acquisition Holdings Inc. (9089); Instant Brands Acquisition Intermediate Holdings Inc. (3303); Instant Brands Holdings Inc. (3318); URS-1 (Charleroi) LLC (7347); Instant Brands LLC (0566); URS-2 (Corning) LLC (8085); Corelle Brands (Latin America) LLC (8862); EKCO Group, LLC (7167); EKCO Housewares, Inc. (0216); EKCO Manufacturing of Ohio, Inc. (7300); Corelle Brands (Canada) Inc. (5817); Instant Brands (Canada) Holding Inc. (4481); Instant Brands Inc. (8272); and Corelle Brands (GHC) LLC (9722). The address of the debtors' corporate headquarters is 3025 Highland Parkway, Suite 700, Downers Grove, IL 60515.

Accordingly, the Debtors submit that the Procedures for Complex Chapter 11 Cases in the Southern District of Texas should apply.

Dated: June 12, 2023

Houston, Texas

HAYNES AND BOONE, LLP

/s/ Arsalan Muhammad

Charles A. Beckham, Jr. (TX Bar No. 02016600) Arsalan Muhammad (TX Bar No. 24074771) David A. Trausch (TX Bar No. 24113513) 1221 McKinney Street, Suite 4000 Houston, Texas 77010

Tel.: (713) 547-2000

Email: charles.beckham@haynesboone.com arsalan.muhammad@haynesboone.com david.trausch@haynesboone.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (*pro hac vice* pending) Steven Z. Szanzer (*pro hac vice* pending) Joanna McDonald (*pro hac vice* pending) 450 Lexington Avenue New York, New York 10017

Tel.: (212) 450-4000

Email: brian.resnick@davispolk.com steven.szanzer@davispolk.com joanna.mcdonald@davispolk.com

Proposed Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that, on June 12, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Arsalan Muhammad

Arsalan Muhammad